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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

JANELLE FOLKERTS and MICHAEL
FOLKERTS, on their own behalf, and as
parents and legal guardians of A.F., a disabled
person,
Plaintiffs,
vs.
CITY OF NORTH LAS VEGAS, A
Political Subdivision of the State of Nevada,
North Las Vegas Detective DORINDA
SANTOS, North Las Vegas Sergeant
KATHRYNE GASPARDI,
Defendants.

Case No.: 2:22-cv-01192-GMN-BNW
Stipulation to Reset Deadlines

JOINT STIPULATION TO RESET DEADLINES

IT IS HEREBY STIPULATED AND AGREED by and between Plaintiffs, JANELLE FOLKERTS and MICHAEL FOLKERTS, on their own behalf, and as parents and legal guardians of A.F., a disabled person, and Defendants CITY OF NORTH LAS VEGAS and North Las Vegas Detective DORINDA SANTOS, North Las Vegas Sergeant KATHRYNE GASPARDI (“Defendants”) (collectively hereinafter the “Parties”), by and through their respective counsel of record, that the current deadline for responding to Defendants’ Motion for

Summary Judgment be continued to May 3, 2023, the deadline to file any reply in support of the Motion for Summary Judgment continued to May 17, 2023, and the deadline for filing the Proposed Joint Pretrial Order be stricken and reset.

I. PROPOSED EXTENDED DEADLINES

The parties respectfully request this Court enter and order as follows:

Plaintiffs shall file their response to Defendants' motion for Summary Judgment (currently due by April 12, 2023), on or before May 3, 2023.

Defendants shall file their reply in support of their Motion for Summary Judgment (currently due by April 26, 2023), on or before May 17, 2023.

The Proposed Joint Pretrial Order deadline (currently April 21, 2023) is stricken and will be reset by the Court pursuant to LR 26-1(b)(5).

This request is made in good faith and joined by all the parties in this case. Trial is not yet set in this matter. Accordingly, this extension will not delay this case. Moreover, since this request is a joint request, neither party will be prejudiced.

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IT IS SO STIPULATED.

1 DATED: April 7, 2023

DATED: April 7, 2023

2 NORTH LAS VEGAS CITY
3 ATTORNEY

LAW OFFICE OF JORDAN MARSH LLC

4 By /s/ Madison Zornes-Vela

By /s/ Jordan Marsh

5 Micaela Rustia Moore, Esq.

Jordan Marsh

6 Nev. Bar No. 9676

LAW OFFICE OF JORDAN MARSH

7 City Attorney

5 Revere Drive, Suite 200

8 Noel E. Eidsmore, Esq.

Northbrook, Illinois 60062

9 Nev. Bar No. 7688

And

10 Chief Deputy City Attorney

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11 Madison Zornes-Vela

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13 Deputy City Attorney

Henderson, Nevada 89074

2250 Las Vegas Blvd. North, Suite 810

Attorneys for Plaintiffs

North Las Vegas, Nevada 89030

Attorneys for Defendants

14 **ORDER**

15 IT IS SO ORDERED.

16 Dated this 7 day of April, 2023

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20 U.S. DISTRICT COURT JUDGE
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